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15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 2-Way Computing, Inc.,
18 Plaintiff,
19 v.
20 Cisco Systems, Inc.,
21 Defendant.

Case No. 2:15-cv-02235-GMN-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE
TO FILE PROPOSED PROTECTIVE
ORDER**
(First Request)

23 Plaintiff 2-Way Computing, Inc. (“2-Way”) and Defendant Cisco Systems, Inc. (“Cisco”) by
24 and through their counsel, hereby file this Stipulation and [Proposed] Order to Extend the Deadline
25 to File Proposed Protective Order. This request complies with Local Rules 6-1, 6-2, and 7-1. The
26 litigation of this matter will be best served by the proposed extension. This is the first request to
27 extend this deadline. This request is not made after the deadline.
28

On April 22, 2016, the Court entered the Discovery Plan and Scheduling Order in this matter, ECF No. 35, setting April 27, 2016 as the deadline for the parties to file a proposed protective order. The parties agree that a two-week extension of the proposed protective order deadline, to May 11, 2016, will permit the parties time to resolve any initial disagreements regarding the language of the proposed protective order and work toward submitting an agreed proposed order to the Court.

Accordingly, Plaintiff and Defendant respectfully request that the Court grant this request to continue the deadline to file a proposed protective order.

Dated: April 27, 2016

Respectfully submitted,

/s/ Stanley H. Thompson, Jr.

/s/ Jennifer H. Forte

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ORDER

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: April 28, 2016

CERTIFICATE OF SERVICE

I hereby certify that I am a citizen of the United States and am employed in Fulton County, where this mailing occurs. I am over the age of eighteen years and not a party to the within entitled action; my business address is 1075 Peachtree Street, Suite 2000, Atlanta, Georgia 30309.

On April 27, 2016, I served the document described as **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE PROPOSED PROTECTIVE ORDER** on the interested party(ies) in this action as follows:

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BY ELECTRONIC SERVICE: I served a true copy, with all exhibits, electronically on designated recipients via electronic transmission of said document(s) as provided under Federal Rules of Civil Procedure.

BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Las Vegas, Nevada, in the ordinary course of business.

/s/ Jennifer H. Forte

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